

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America  
Angel MARTINEZ<sup>V</sup> 1994

Case No.

7:18mj 1256

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 13, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841

did knowingly and intentionally possess with the intent to distribute  
approximately 12 kilograms of cocaine

21 U.S.C. § 846

conspiracy to possess with the intent to distribute approximately 12 kilograms of  
cocaine

This criminal complaint is based on these facts:

See Attachment "A"

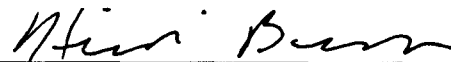
✓ Continued on the attached sheet.

approved by  
JUST K. S. G. C.

Sworn to before me and signed in my presence.

Date: 6/14/18, @ 8:20 a.m.

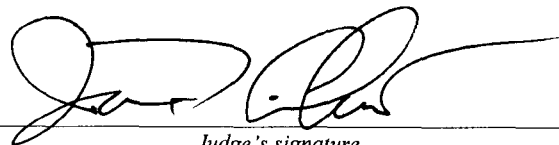
City and state: McAllen, Texas



Complainant's signature

Heidi Bridges, HSI Special Agent

Printed name and title



Judge's signature

U.S. Magistrate Juan Alanis

Printed name and title

On June 13, 2018, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received a duty call from the U.S. Customs and Border Protection, Office of Fields Operations (CBP/OFO) at the Pharr, Texas Port of Entry. Angel MARTINEZ attempted to enter the United States from the United Mexican States with approximately 12 kilograms of cocaine concealed in a non-factory compartment located in the rocker panels of a 2006 Ford Fusion.

Earlier that same day, MARTINEZ arrived at the vehicle inspection lane at the Pharr Port of Entry in a 2006 Ford Fusion displaying Texas license plate DNH 1293. During the primary inspection, CBPO O. Cantu obtained a negative declaration for narcotics from MARTINEZ. MARTINEZ stated he owned the vehicle. MARTINEZ had an outstanding warrant for his arrest and was referred for a secondary inspection.

During the secondary inspection, CBPO E. Gomez obtained a second negative declaration from MARTINEZ for narcotics. The vehicle was sent for a non-intrusive inspection of the vehicle. During the inspection CBPO O. Cantu observed anomalies inside the rocker panels of the vehicle. Canine Enforcement Officer J. Hernandez searched the vehicle and received an alert to the odor of narcotics from his assigned canine "Vegron". HSI Special Agent (SA) H. Bridges advised CBPOs to remove the contraband from the vehicle rocker panels, which resulted in the seizure 12 kilograms of cocaine.